

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE  
LITIGATION

-----X 07CV01569(AKH)  
MIGUEL BARONA AND MARIA SUCUZHANYAY,

Plaintiffs,

- against -

ANSWER TO  
AMENDED  
COMPLAINT

120 BROADWAY CONDOMINIUM (CONDO #871),  
120 BROADWAY HOLDING, LLC,  
120 BROADWAY PROPERTIES, LLC,  
120 BROADWAY LLC,  
25 BROADWAY OFFICE PROPERTIES LLC,  
715 REALTY CORP.,  
ACTA REALTY CORP.,  
ALAN KASMAN DBA KASCO,  
AMBIENT GROUP INC.,  
AMG REALTY PARTNERS, LP,  
ANN TAYLOR STORES  
CORPORATION, BATTERY PARK CITY AUTHORITY,  
BLACKMON-MOORING-STEAMATIC  
CATASTROPHE, INC. D/B/A BMS CAT,  
BOARD OF MANAGERS OF THE 120 BROADWAY CONDOMINIUM  
(CONDO #871),  
BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM,  
BROOKFIELD FINANCIAL PROPERTIES,  
INC., BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS INC.,  
CITIBANK, NA,  
ENVIROTECH CLEAN AIR, INC., GPS  
ENVIRONMENTAL CONSULTANTS, INC., HILLMAN  
ENVIRONMENTAL GROUP, LLC.,  
HUDSON VIEW EAST CONDOMINIUM,  
HUDSON VIEW TOWERS ASSOCIATES,  
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,  
JONES LANG LASALLE AMERICAS, INC.,  
JONES LANG LASALLE SERVICES INC,  
KASCO RESTORATION SERVICES CO.,  
MERRILL LYNCH & CO, INC., NOMURA HOLDING AMERICA,

INC., NOMURA SECURITIES INTERNATIONAL, INC.,  
RY MANAGEMENT CO INC.,  
RY MANAGEMENT,  
SILVERSTEIN PROPERTIES,  
SILVERSTEIN PROPERTIES INC.,  
STRUCTURE TONE(UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC.,  
TOSCORP INC.,  
TRINITY CENTRE LLC,  
VERIZON NEW YORK, INC,  
WESTON SOLUTIONS, INC., WFP TOWER  
B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER  
B. CO., L.P., WFP TOWER D CO. G.P. CORP ., WFP TOWER D  
HOLDING CO. II L.P., WFP TOWER D HOLDING I G.P. CORP.,  
AND WFP TOWER D. CO., L.P., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc.  
("Envirotech"), as and for their responses to the allegations set forth in the Amended  
Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in  
the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint  
dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower  
Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the  
above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York  
September 14, 2007

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT  
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BY:   
Heather L. Smar (4622)